

ATTACHED

Do you swear under penalty of perjury that the following answers you give are true and accurate?

Yes

When do you first recall working in the same facility as Ken Del Signore (kd)  
*Late in 2015 he was assigned to my group.*

2. Were you kd's tech team lead from approximately Nov 2015 to March 2017?

Yes

2a. Have you been in nearly continuous contact with kd regarding the PMUD/Shannon project and the subsequent whistleblower action?

Yes

3. Did kd talk to you by telephone on approximately Aug 31st, 2018 about a call he had just recently had with Christi Gliori regarding a threat to his short term disability benefits following an email he had sent earlier that day that showed an April Fools Day joke job offer from Lucent Government Services?

Yes

4. Please describe what you recall from that call.

*There were a couple main points as I recall. First that he speculated that Chris Miranda was the perpetrator for the April fools day joke email and also that Christy Gliori had threatened his benefits if he didn't stop sending emails, etc. Also, I remember that this threat occurred soon after Ken spoke with lawyers from Nokia.*

*In another call we discussed his email getting shut down, and his access to the building was suspended. Although I don't recall the exact dates.*

5. did you meet kd at a microbrewery/restaurant in the south west Chicago suburbs in approximately early February 2019?

Yes, at Pollyanna

6. do you recall kd taking a call from MetLife regarding long term disability benefits while in this restaurant?

Yes

7. Please describe anything you remember about what kd said (that day or thereafter) about this call or how he responded to it.

*He mentioned that he had received a call from Metlife and it was very strange. I asked him what he meant, and he said that the agent/caller was very rude and somewhat demeaning. I seem to recall some sort of threat about not getting the benefit, but I'm not very clear on that. Later he speculated that someone at Nokia must have spoken with Metlife regarding long term disability which seemed inappropriate to us.*